

OFFICE OF  
GENERAL COUNSEL

Office of General Counsel  
Federal Election Commission  
1050 First Street NE  
Washington, D.C. 20463

2018 MAR 27 PM 2: 59

Complaint

State of New York )  
                                  ) S.S.  
County of New York )

MUR # 7352

DEBORAH COUGHLIN being duly sworn, deposes and states that:

1) I am of majority age and reside at .

New York, NY 10028

2) I file this complaint against Regina Glocker and her employer Hedley May located at 52 Vanderbilt Avenue, Suite 901, New York, New York, 10017 and Kirsten Gillibrand, a candidate for U.S. Senate from New York State and her political committee Gillibrand for Senate located at 126 C Street NW, Washington, DC 20001.

3) Upon information and belief and reports from the New York Post on March 10, 2018 (attached), Hedley May, through the actions of employee Regina Glocker may be violating the provisions of 2 U.S.C. 441b prohibiting corporate contributions to federal candidates. In turn, Kristen Gillibrand and her political committee Gillibrand for Senate may be violating the provisions of 2 U.S.C. 441 a (f) prohibiting candidates and political committees from accepting unlawful contributions.

4) Specifically, it is alleged that Hedley May through its employee Regina Glocker is using corporate resources to conduct opposition research on behalf of Kristen Gillibrand regarding Chele Chiavacci Farley who is a candidate competing against Kristen Gillibrand for the U.S. Senate seat from New York State. Upon information and belief, Gillibrand for Senate is not compensating Hedley May for such services thereby rendering them an unlawful contribution.

5) I hereby request that the Federal Election Commission investigate this violation of law.

Deborah Coughlin

Signed and sworn  
To before me  
This 26 day  
Of March 2018

Notary Public

MOHAMMED ASHIK  
Notary Public - State of New York  
NO. 01AS6334832  
Qualified in Queens County  
My Commission Expires Dec 21, 2019